Comments on the Site Operations Plan (SOP)
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for the Millington, New Jersey and Three Satelite
National Gypsum Company (Gypsum) Superfund Sites

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1. 1-1 The SOP is seriously deficient in that it does not clearly indentify the perceived or anticipated problem at any of the sites. As a result, it is impossible to determine whether the Plan itself or the associated Work/Quality Assurance Project Plan (QAPP) make any sense. For example, it is our understanding from previous experience that the Millington Site consists of a huge pile of asbestos-containing manufacturing debris on the banks of the Passaic River. The environmental threat, as we understand it, is from asbestos fibers being washed into the River (and subsequently into drinking water, perhaps) and from asbestos dust becoming airborne and carried to nearby communities. The Plan does not mention any of this, nor does it describe the Satelite Sites at all. Without at least a brief description of the problem, there is no way that the proposed solution can make any sense.

2-1 It would seem logical to try to obtain data from Gypsum concerning what was deposited where, when.

2-17 The Engineering Analysis of subsurface samples is apparently designed, in part, to determine the physical stability of the asbestos piles (for no clearly stated reason). While this may be a good idea, it is not clear that a few small samples would produce useful data for such a large pile that is, we believe, suspected of containing a variety of waste configuration (shingles, raw asbestos, etc.). In particular, we question the assumption of homogeneity.

2-24 The stated purpose of the ambient air sampling is "to identify whether significant amounts of asbestos fibers would be released during any excavation that might be undertaken during remedial actions." This is a worthy goal, but it is highly unlikely that the sampling and analytic program described in the Plan would produce the desired information. The difference in effect between drilling a four-inch hole and bulldozing a four-foot trench is quite significant. We do not need any sampling to tell us that enormous numbers of asbestos fibers would be released during the digging of a pile of dry friable or even semi-friable asbestos-containing debris. In fact, sampling could only confuse the issue. Much more to the point would be an analysis of the friability of the asbestos-containing material in the fill. During any subsequent remedial work, the uncovered fill would probably need to be wetted almost continuously and kept wet during all stages of collection and handling to minimize the release of fibers. Thus, it would also make sence for the Engineering Analysis to examine the effect of added water on the stability of the material.

We wish to stress here the fact that we are recommending that no air sampling for asbestos be performed for the stated purpose. There may be some value in sampling to monitor worker exposure during drilling but, as the Plan states, this is minimal as well.